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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MEGAN SCHMITT, DEANA
REILLY, CAROL ORLOWSKY, and
STEPHANIE MILLER BRUN,
individually and on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

YOUNIQUE, LLC,

Defendant.

Case No. 8:17-cv-01397-JVS-JDE

**DECLARATION OF ADAM
GONNELLI IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

*Filed Concurrently with
Plaintiffs' Notice of Motion
and Motion for Class
Certification, Declaration of
Donald M. May, Declaration
of Bonner Walsh, and
[Proposed] Order*

Complaint Filed: 8/17/17

Trial Date: 2/19/19

1 I, Adam Gonnelli, hereby declare:

2 1. I am a partner of the Sultz Law Group, P.C., counsel for Plaintiffs
3 Megan Schmitt, Deana Reilly, Carol Orlowsky, and Stephanie Miller Brun in the
4 above-captioned matter.

5 2. I have personal knowledge of the facts stated below. If called upon to
6 do so, I could and would competently testify thereto.

7 3. I submit this declaration in support of Plaintiffs' Motion for Class
8 Certification.

9 4. The Sultz Law Group focuses on complex civil litigation, including
10 consumer class actions, many of which involve on-label misrepresentations about
11 food and beverage ingredients. Since the firm's founding in 2013, we have acted as
12 lead counsel in numerous high-profile consumer fraud and false advertising class
13 actions. For instance, we recently acted as lead counsel in the prosecution of the
14 following representative consumer class actions:

- 15 • *Vincent, Wesley, et al. v People Against Dirty, PBC. and Method Products,*
16 *PBC., (S.D.N.Y. 7:16-cv-06936)* (served as co-lead counsel and obtained a
17 settlement fund of \$2.8 million on behalf of a national class of consumers
18 who purchased cleaning products deceptively marketed as "Natural")
- 19 • *Run Them Sweet, LLC v. CPA Global, Ltd., et al, (United States District*
20 *Court Eastern District of Virginia 1:16-cv-1347)* (obtained a settlement fund
21 of \$5.6 million on behalf of consumers who were overcharged with respect
22 to foreign patent renewal services)
- 23 • *Rapoport-Hecht, Tziva et al. v. Seventh Generation, Inc. (S.D.N.Y. 14-cv-*
24 *9087)* (served as co-lead counsel and obtained a settlement fund of \$4.5
25 million on behalf of a national class of consumers who purchased cleaning
26 products deceptively marketed as "Natural")
- 27 • *Foster, Andrew Tyler et al. v. L-3 Communications EOTECH, Inc., et al.*

(*United States District Court Western District of Missouri 15-cv-03519*)
 (obtained millions of dollars in monetary relief for consumers who purchased
 falsely advertised holographic weapons sights)

- *Davenport, Sumner, et al. v. Discover Financial Services, et al. (United States District Court for the Northern District of Illinois 15-cv-06052)* (served as co-lead counsel and obtained a settlement fund of \$5.6 million for victims of violations of the Telephone Consumer Protection Act)
- *Baumgarten v. Cleanwell, LLC, (E.D.N.Y. 1:16-cv-01780)* (obtained injunctive relief on behalf of a national class of consumers against company that deceptively marked cleaning products as “Natural”)
- *Nicotra, Jennifer et al. v. Babo Botanicals, LLC (E.D.N.Y. 16-cv-00296)* (obtained injunctive relief on behalf of a national class of consumers against company that deceptively marked skin and haircare products as “Natural”)
- *Mayhew, Tanya, et al., v. KAS Direct, LLC and S.C. Johnson & Son, Inc. (S.D.N.Y. 16- cv-6981)* (preliminary approval pending for a proposed \$2.2 million settlement fund on behalf of a national class of consumers who purchased baby products deceptively marketed as “Natural”)

5. Sultzer Law is headquartered in New York, and maintains offices in New Jersey, and Pennsylvania. The firm is included in Martindale-Hubbell's Bar Register of Preeminent Lawyers for its class action practice. Jason Sultzer and Joseph Lipari are AV rated by Martindale-Hubbell and have been selected as Super Lawyers. The firm's class action practice has been featured in numerous publications, including Law360, Inside Counsel Magazine, Risk Management Magazine, and CNBC News. In addition, the attorneys within the firm have written and lectured extensively on class action practice.

1 6. Attached hereto as Exhibit 1 is a true and accurate copy of the Rough
2 Transcript of the July 27, 2018 Deposition of Vrena Ranallo.

3 7. Attached hereto as Exhibit 2 is a true and accurate copy of a website
4 capture of Yunique.com from August 2013.

5 8. Attached hereto as Exhibit 3 is a true and accurate copy of a website
6 capture of Yunique.com from August 2014.

7 9. Attached hereto as Exhibit 4 is a true and accurate copy of a document
8 Plaintiffs believe Yunique sent to its sales force prior to October 2014.

9 10. Attached hereto as Exhibit 5 is a true and accurate copy of Bates
10 YNQE0000345 produced by Defendant in discovery.

11 11. Attached hereto as Exhibit 6 is a true and accurate copy of Bates
12 YNQE0000994 produced by Defendant in discovery.

13 12. Attached hereto as Exhibit 7 is a true and accurate copy of Bates
14 YNQE0000731 produced by Defendant in discovery.

15 13. Attached hereto as Exhibit 8 is a true and accurate copy of Bates
16 YNQE0001240 produced by Defendant in discovery.

17 14. Attached hereto as Exhibit 9 is a true and accurate copy of Bates
18 YNQE0001014 – YNQE0001019 produced by Defendant in discovery.

19 15. Attached hereto as Exhibit 10 is a true and accurate copy of the
20 Transcript of the June 27, 2018 Deposition of Plaintiff Deanna Reilly.

21 16. Attached hereto as Exhibit 11 is a true and accurate copy of the
22 Transcript of the June 25, 2018 Deposition of Plaintiff Stephanie Miller Brun.

23 17. Attached hereto as Exhibit 12 is a true and accurate copy of the
24 Transcript of the June 26, 2018 Deposition of Carol Orlowsky.

25 18. Attached hereto as Exhibit 13 is a true and accurate copy of the Rough
26 Transcript of the July 27, 2018 Deposition of Megan Schmitt.

1 19. Attached hereto as Exhibit 14 is a true and accurate copy of the resume
2 of the Sultzer Law Group, P.C.

3 20. Attached hereto as Exhibit 15 is a true and accurate copy of the resume
4 of Nye Peabody Stirling Hale & Miller, LLP.

5 21. Attached hereto as Exhibit 16 is a true and accurate copy of Bates
6 YNQE0002967-0002970 produced by Defendant in discovery.

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8 Dated: August 1, 2018

9 Red Bank, New Jersey
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12 THE SULTZER LAW GROUP P.C.

13 By: /s/ Adam Gonnelli

14 Adam Gonnelli, Esq.

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